

ITEM 7-B

HISTORICAL ADVISORY BOARD AGENDA REPORT

DATE: May 5, 2011

TO: HONORABLE CHAIR AND MEMBERS OF THE
HISTORICAL ADVISORY BOARD

FROM: Simone Wolter, HAB Secretary
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APPLICATION: Discussion of Potential Additions of Structures and
Appurtenances to the City of Alameda Historic Study List.

ZONING DISTRICT: M-2-G, Industrial Manufacturing with a Government Overlay

GENERAL PLAN: Federal Facilities

EXECUTIVE SUMMARY

In January 2011 the Alameda Architectural Preservation Society approached the Historic Advisory Board with the request to consider adding several structures and appurtenances on the former Naval Air Station (NAS) at Alameda Point to the City of Alameda NAS Historic District, which is listed as a City of Alameda Historic Monument or Landmark.

The Board agreed to evaluate the structures and then discussed the options available to place the structures on the NAS Historic District list or the City of Alameda Architectural and Historical Resources Study List (Study List). Based on available historic resources to document the structures and current staffing constraints the Board determined that the inclusion of the structures on the Historic Study List would be the easiest to facilitate and allow for a minimum of protection of said structures against demolition or alterations once redevelopment at Alameda Point begins.

On March 26, 2011 the Historical Advisory Board held a special meeting to tour Alameda Point in conjunction with the Planning Board. The tour allowed for an on-site visit of the proposed additions to the Study List.

As of April 2011 City staff has verbally informed Navy staff that the HAB Board is considering adding structures and appurtenances to the City's Historic Study List. A

formal notice will be issued to the Navy once the Board has made a full determination on which of the suggested structures would be added to the Study List.

BACKGROUND & REGULATORY FRAMEWORK

What kind of historic evaluations at NAS have occurred in the past?

As part of the transfer of Federal lands to a local government and prior to the start of redevelopment of the Naval Air Station in Alameda (NAS), now called Alameda Point, the Navy is required to conduct a consultation process, called Section 106 Consultation. The consultation process addresses how historic resources within the Naval Air Station would be impacted by redevelopment.

This process started in 1993, but the first inventory did not occur until 1997, when Bay Area architectural historian Sally Woodbridge prepared an inventory of pre-1946 buildings at Naval Air Station Alameda (NAS) for the United States Navy. She identified a district eligible for listing in the National Register of Historic Places, a finding shared by the California State Historic Preservation Officer.

The period of historic significance of the district was identified as 1938-1945. The district was determined to be significant under National Register of Historic Places criterion A: the development of World War II U.S. Navy bases in the San Francisco Bay Area. The district also met National Register criterion C, for its Art Moderne architecture. The site plan and landscaped park-like setting were also identified as significant elements.

While no individual building or resource was eligible for the National Register, some 85 buildings were evaluated as contributors to the historic district. Although deemed eligible for the National Register, the district has not yet been nominated or designated as such. Local recognition came in 1999 when the Alameda City Council designated the NAS Historic District as a City Historical Monument or Landmark. This designation is reserved for Alameda's most important buildings and sites; only twenty-nine Monuments or Landmarks have been so recognized.

As part of the Section 106 Consultation process, local preservation groups began investigating significant structures and appurtenances that were "marooned" outside the boundaries of the historic district. They also felt that some sites within district boundaries had not been adequately recognized for their historic and/or architectural importance. As a result of the concerns, the Navy agreed to reevaluate the proposed Historic District.

In late 2010 the Navy issued a Draft '*Combined Specific Buildings Survey and Evaluation Report/Cold War Era Historic Resources Survey and Evaluation Report*' which evaluates all structures at Alameda Point, including all structures within the existing Historic District boundary. The report is authored by JRP Historical Consulting, LLC, which is comprised of qualified architectural historians. The report determined that several previously not included structures had become eligible for inclusion in the

Historic District and that the NAS Historic District boundaries should be expanded to include the seaplane lagoon and its appurtenances, such as the Jetty and Bulkhead.

The report also determined that several structures, such as the Flight Control Tower, continue to fall short of eligibility criteria. As a result, the Alameda Architectural Preservation Society approached the HAB to consider adding several structures and other appurtenances to the City of Alameda Historic Study List.

What is the Purpose of the Historic Study List?

In the early 1980s Alameda preservation volunteers and enthusiasts, as well as staff surveyed most of Alameda and developed an inventory identifying whether structures were significant enough to be considered for preservation. Evaluators made a judgment call on the quality of each historic resource and whether it should be considered for preservation individually or as a part of a grouping or neighborhood.

The survey results were culled into a list called the *Architectural and Historical Resources of the City of Alameda*, also referred to today as the Historic Study List. Structures on the Historic Study List cannot be demolished without prior approval by the City of Alameda Historical Advisory Board (HAB). The Alameda Municipal Code 13-21.7.b states:

“No protected structure shall be demolished or removed without the approval of a certificate of approval issued by the HAB. Protected structures shall mean non-building and building resources listed on the Historical Building Study List.”

The process of adding the structures and appurtenances to the Study List requires that the property owner, in this case the Navy, be notified of the intent of adding the structures to the list. For the pending addition of 29 structures and appurtenances to the Historic Study List, staff has verbally informed Navy staff that the HAB is considering adding structures to the local Historic Study List, but a formal notice announcing the addition will occur once the board has had an opportunity to fully discuss the additions to the list.

Background on the Historic Study List in Alameda

The special protection in the Municipal Code for structures placed on the Study List was a stop-gap measure to prevent the intended or accidental demolition of structures deemed potentially historic. At the time of evaluation the approximately 4,000 structures were deemed potentially historic, but more research and background documentation was required to possibly elevate the structures to the level of a City Historic Monument or Landmarks.

Many cities across the state have limitations on the time line within which the historic resource needs to be evaluated and then a decision must be made whether it is historic enough to be a Historic Monument or Landmark. The City of Alameda does not have a time limitation at this time. As a result, all structures listed in the Historic Study List have been ‘moth balled’ awaiting further evaluation. However, the City is challenged to find funding to properly evaluate all resources according to State Preservation Office Standards, nor does staff have the appropriate educational background to evaluate the structures, as none of the planners possess qualifications in architectural history or preservation architecture.

As it stands today, the Historic Study List is an incomplete inventory of potentially historic structures within the City of Alameda. On more than one occasion staff has experienced that apparently insignificant structures were listed in the Study List, but that adjacent obviously significant structures were not included in the list. Staff also frequently disagrees with the classification that structures received in the Historic Study List. There are also significant amounts of structures that do not contain a classification at all.

The Future of the Historic Study List

It would be a prudent of the Board to consider whether it is appropriate to add a building or other appurtenance to the Historic Study list if experts in the field of architectural history have stated that these structures do not rise to the level of a landmark. It is a goal of proposed draft Historic Preservation Ordinance to clarify what the purpose of this Study List is and what criteria are needed to place a structure or site onto it.

The lack of evaluation consistency for addition of structures to the Historical Study List, as well as the age of the initial assessment (1979) necessitates revisions to the current municipal code. To that end, City staff is looking at alternatives on how the development and entitlement process can better protect *all* potentially historic structures and landscapes. Code recommendations forthcoming in the draft Historic Preservation Ordinance will likely include that all structures older than 50 years, regardless of listing status, will require a Board permit for demolition. The actual definition of demolition is also being updated with more user friendly language. The Historical Advisory Board would review all such applications and decide at that time whether or not the building should be placed on the Historic Study List (for a finite amount of time) or allowed to be demolished. The items currently on the List itself will be reviewed as staff and volunteer time permits to a more manageable size. Any item already found in another study to not warrant historic status would be removed as part of that process.

California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA)

Because Alameda Point is currently under Federal ownership, it is under the purview of the National Environmental Policy Act, which requires the Section 106 process as outlined above. Once the Navy transfers the base property to the city, there will be a Historic District nomination recorded with the State. The research and legal background for this Historic District will have come from Sally Woodbridge and the 2010 Navy Study reports. The District will contain many contributing structures and many non-contributing structures, some of which may or may not be listed in the City's local Historic Monument or Landmark List or Study List.

Once the City retains ownership of this land then the California Environmental Quality Act (CEQA) prevails. It requires that before any discretionary project (i.e. design review or demolition) is approved; a review of possible significant adverse impacts must be completed. When a historic resource is the site of the proposed project or immediately adjacent to the proposed project, a special review must be completed to determine if that resource would suffer any significant adverse impacts as a result of the project. If it is possible that a historical resource will be adversely impacted, an Initial Study must be completed to see if any mitigations could be completed that would ensure that no adverse impact would result. More often though, an Environmental Impact Report (EIR) must be prepared because if a project involves or is adjacent to a historical resource, mitigations are very hard to identify that will still meet the goals of the project. It is important to note that historic resources are those sites and buildings that are either landmarks, (Federal, State or Locally designated) or could potentially be historic, but not yet listed. Pursuant to State Code 21084.1:

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

Should redevelopment in the future require any demolition of contributing and non-contributing structures of a Historic District, the property owner or the developer will

likely have to complete an Environmental Impact Report (EIR) to assess, amongst many other environmental impacts, the impacts of the project on the historic resources and the Historic District. If no satisfactory mitigations are identified, the body of decision would need make overriding considerations of public benefit to allow the any impacts on the identified historic resources. This action would have to take place at a public hearing.

CEQA will apply to all structures at Alameda Point that are in the Historic District or listed as a Landmark/Monument on any city, county, state or federal list. It will also apply to any structures that may be deemed potentially historic. An EIR will be brought to the HAB for review, but the final reviewing and certifying authority will lie with the City Council. The City Council has the option to overrule any other board or commission's concerns and certify (accept) the EIR and issue a Statement of Overriding Considerations.

The key understanding to be taken away from CEQA is that while it affords substantive protection for historic resources, no status will protect any structure from adverse impact or even demolition, as long as due process is given and if the City Council makes overriding considerations supporting the project that may adversely impact historic structures.

How to classify and protect the proposed structures and appurtenances?

In light of the regulatory framework, staff recommends to focus resources and determine which structures and appurtenances truly require special consideration, because they have local importance to Alameda and/or development of the Naval Air Station. Staff recommends several options to provide focused protection and to apply the powers of the HAB in a way that ensures its integral engagement in the future redevelopment at Alameda Point. This section considers all structures and appurtenances as listed in Attachment 1.

Staff suggests reviewing the structures and appurtenances with the following methodology in mind:

1. Only include those structures that have not already been evaluated under the Sally Woodbridge and JRP evaluation reports:

- Building 78 (WAVES Building)
- Buildings 194 and 273 (ARMCO huts)

Despite the fact that the WAVES building is still standing, initially, the Navy only added the WAVES structure with the intent to have it serve as a temporary structure. The WAVES building is therefore exempt from any federal listing or evaluation, as the Navy has an agreement with the Secretary of the Interior on evaluations of temporary structures. Although it has received some research, the national agreement precludes

its addition to the Historic District, not only because of its temporary nature, but also because it is located outside of the Historic District.

Staff's recommendation is to include this structure in the Study List, but also cautions that this action would only 'park' it for an indeterminate amount of time, before further research could be conducted. In light of the original intent of Historic Study List, is it likely that the WAVES building could be inducted as a City of Alameda Monument or Landmark? Does it meet any of the criteria for inclusion as a Monument or Landmark? Using the original language that formulated the Historic Study List does the WAVES building have:

Architectural significance (i.e. the style of a resource, the reputation and ability of its architect, the quality of its design, its uniqueness, and the materials and methods of its construction and execution), or

Historical significance: the association of the resource with a person or event that has made a significant contribution to the community, from an association with the broad patterns of cultural, social, political, economic, or industrial history, or the urban development of Alameda), or

Environmental significance: the continuity or character of a street or neighborhood with a historical resource's setting on a block, its landscaping and (or) its visual prominence as a landmark or symbol of a street, a neighborhood or the City of Alameda), or

Design integrity: an analysis of alterations that have been made to the original materials and design features of the resource?

One could likely argue that the WAVES building could qualify for the second criterion "Historical Significance".

A similar evaluation must be considered for the ARMCO huts. Can ARMCO huts withstand scrutiny in the light of the four criteria above? Staff deems it unlikely that these structures could qualify for any one of the criteria and does not recommend placing the ARMCO huts on the Study List with the intent to potentially elevate them to a Historic Monument or Landmark.

2. Await the outcome of the public comment period on the 2010 evaluation report to see how the Navy has reassessed buildings 11, 12, and 19.

At this time, buildings 11, 12, and 19 have been evaluated by two qualified architectural historians, who have determined that there is insufficient evidence to include these structures as contributing structures to the Historic District. However, pending the public comment response by the Navy, these structures may be reevaluated as contributors.

If they are included as contributors, they would be included in the Historic District. If the structures remain non-contributors or remain outside of the Historic District, the Board can then reassess their inclusion in the Study List. It is staffs' recommendation to not include these structures at this time, because two architectural historic reviews have already determined that they lack sufficient distinction to be contributors.

Given the level of research already conducted on these structures, it is unlikely that more evidence could be revealed that would justify their elevation to either a contributor to the Historic District or independent recommendation for a City of Alameda Monument or Landmark. However, staff does recommend that at the very minimum building 19 could qualify for Historical or Environmental Significance.

3. Develop a memorandum of understanding to ensure that these appurtenances find special consideration in all future development plans and that they are retained for educational purposes that showcase the local importance of these resources:

- A-4 Skyhawk on pylon
- A-7 Corsair II on pylon
- Anchors
- Flagpole
- Plaque (Base Closure Time Capsule)
- Plaque (Trans American Airlines China Clipper)
- Plaque (Transcontinental Railroad)
- Salute Guns
- Statues on BEQ (Eagles and Pegasus)

Staff does not recommend adding these structures and appurtenances to the Study List because they have been evaluated by JRP and there is inadequate evidence that would argue for elevation as a contributor to the Historic District. The evaluation pursuant to the four criteria for listing as a City Monument or Landmark may highlight that the appurtenances all represent a historic context, but are not 'historic' in themselves.

However, it is self-evident that these appurtenances all carry some intrinsic value that transmits the history of NAS, Alameda Point, or the City of Alameda. These appurtenances should be retained and carried forth in any future development proposal to tie the new development into the historic past. While the creation of a 'historic park' may convey false historicism, akin to Preservation Park in Oakland, the retention of all appurtenances and inclusion in future development would render a more authentic Alameda Point.

Staff therefore recommends that the Board request from City Council that they officially direct staff to retain a list of these structures in a pro-active manner. This approach allows for a community discussion on these items, setting the tone for on-going dialogue during the redevelopment process.

4. Avoid redundancy of listings and omit those buildings from the proposed list that are already rated as contributors to the Historic District nomination that will be filed with the State prior to conveyance of Alameda Point to the City of Alameda:

- Building 5 (Overhaul and Repair Shops)
- Building 10 (Power Plant)
- Building 15 (Boathouse)
- Building 35 (Radio Transmitter Building)
- Building 64 (Shore Intermediate Maintenance Activity (SIMA) Diving Locker)
- Seaplane Lagoon (including Ramps 1-4, Bulkhead, and Jetty)

The NAS Historic District was recognized in 1999 by City Council as a Historic Monument. Currently, the Navy is proposing to add these structures to the Historic District, which will be given a National Register Nomination (required by the memorandum of understanding between the City of Alameda and the Navy inked in 1994) before the City of Alameda receives Alameda Point. As such, these structures will have been classified as contributors, the research will be complete, the nomination into the Historic District will also have been completed. 'Parking' the structures on the Historic Study List for the sake of 'parking' them, obfuscates the intent of the Study List.

Therefore, staff sees no benefit to adding these structures to the Historic Study List.

RECOMMENDATION

Discuss the structures and appurtenances listed above and reach group consensus on which structures should be considered for inclusion on the Historic Study List.

RESPECTFULLY SUBMITTED BY: REVIEWED BY:

SIMONE WOLTER
PLANNER

MARGARET KAVANAUGH-LYNCH
PLANNING SERVICES MANAGER

Attachment:

1. Proposed Study List Additions